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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN,

Petitioner

v.

Civil No. 1:CV-01-0168

(Judge Rambo)

IMMIGRATION AND NATURALIZATION,

SERVICE

Respondent

## NUNC PRO TUNC MOTION FOR LEAVE TO FILE A RESPONSE IN EXCESS OF FIFTEEN PAGES

Respondent hereby requests <u>nunc pro tunc</u> the Court to permit it to exceed the fifteen-page limit as provided in M.D. Pa. Local Rule 83.32.5 in filing its response to the show cause Order issued by the Court on February 2, 2001. A brief in support of this motion has been filed in accordance with Local Rule 7.5. Counsel certifies that she has not obtained the concurrence of petitioner pursuant to Local Rule 7.1 because petitioner is a prisoner proceeding <u>pro se</u>.

Respectfully submitted,

DAVID M. BARASCH United States Attorney

DULCE DONOVAN

Assistant U.S. Attorney

SHELLEY L. GRANT

Paralegal Specialist

Federal Building

228 Walnut Street

Post Office Box 11754 Harrisburg, PA 17108

Dated: February 27, 2001

## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN,

Petitioner

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Civil No. 1:CV-01-0168

(Judge Rambo)

IMMIGRATION AND NATURALIZATION,

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## CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on February 27, 2001, she served a copy of

NUNC PRO TUNC MOTION FOR LEAVE TO FILE A RESPONSE IN EXCESS OF FIFTEEN PAGES

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

## Addressee:

Paul Turpin A No. 12-355-636 Pike County Jail H.C. 8 Box 8601 Hawley, PA 18428

> SHELLEY L./GRANT Paralegal Specialist